

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	CRIMINAL NO. 04-10274-PBS
)	
)	
TONY DIAZ,)	
a/k/a Jose A. Rivera, Jr.,)	
a/k/a Santo Romero Villar,)	
a/ka/ Jose Rivera Morales,)	
a/k/a Jose Antoni Morales,)	
a/k/a Santo Rodolfo Romero Villar,)	
Defendant.)	

GOVERNMENT'S REVISED SUMMARY
OF EXPERT TESTIMONY - NEW EXPERT

Pursuant to the Fed. R. Crim. P. 16(a)(1)(E), the government hereby discloses a written summary of the testimony and qualifications of Allison M. Larson, a fingerprint analysis expert employed by the Federal Bureau of Investigation (FBI) who will testify at trial (replacing the previous print expert, Genius Johnson (Dept. of Homeland Sec.)).

It is anticipated that Ms. Larson will testify regarding the analysis and comparison of known fingerprints and about the use of those fingerprints to determine the identity of an individual (using more recently obtained fingerprints). The basis for Ms. Larson's testimony and opinions is her familiarity with fingerprint analysis through her training and experience with hundreds of analyses during her tenure at the Latent Print Unit at the FBI's Latent Print Unit at Quantico, Virginia.

Ms. Larson has provided a print analysis in this case and it is anticipated that she will testify that the known fingerprints of Mr. Diaz (obtained by the Lawrence Police Department in

the current matter) match the known prints of the same person contained in the Alien File, maintained by Immigrations and Customs Enforcement (ICE). By so testifying, she will further support the record in the defendant's Alien File which demonstrates that the defendant was at the time of the offense conduct and remains an illegal alien (and that the Alien File is, indeed, properly associated with this particular defendant).

With regard to Ms. Larson's qualifications, she is a recognized expert in fingerprint analysis and routinely performs the duty of similarly comparing such prints. A summary of her professional experience (along with her analysis in the current matter) has been provided to the defendant's counsel and includes that she has been a Physical Scientist / Forensic Examiner with the FBI's Latent Print Unit for more than two years and that she has worked in related fields since May of 2000. Ms. Larson holds a Master of Forensic Science (MFS) degree from George Washington University (2001), among other educational achievements.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Paul R. Moore
Paul R. Moore
Assistant U.S. Attorney

DATE: October 25, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney for defendant Tony Diaz, Andrew M. D'Angelo, Esq., on October 25, 2005, via electronic filing and first class mail (Carney & Basil, 20 Park Plaza, Suite 1405, Boston, MA 02116).

/s/ Paul R. Moore

Paul R. Moore

Assistant U.S. Attorney